

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:

Mervin J. Conner, Jr.

Debtor(s).

CHAPTER 13

CASE NO.: 19-15306-amc

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC d/b/a Shellpoint Mortgage Servicing (“NewRez”), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esquire
Hill Wallack LLP
1415 Route 70 East, Suite 308
Cherry Hill, NJ 08034
Telephone: (856) 616-8086
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PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive NewRez’s (i) right to have final orders in non-core matters entered only after de novo review by

a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: February 23, 2024

Hill Wallack LLP

By: /s/ Angela C. Pattison
Angela C. Pattison, Esq.
1415 Route 70 East, Suite 308
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Counsel to NewRez LLC d/b/a Shellpoint Mortgage
Servicing

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CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance of NewRez LLC dba Shellpoint Mortgage Servicing in the manner indicated below on February 23, 2024:

Mervin J. Conner, Jr.
147 Union Street
Hatfield, PA 19440

Debtor

Via Regular Mail

JOHN L. MCCLAIN
John L McClain & Associates, PC
1851 County Route 27
Owls Head, NY 12969

Counsel for Debtor

Via ECF

Office of the U.S. Trustee
Robert N.C. Nix Federal Building
Suite 320

Philadelphia, PA 19107

United States Trustee

Via ECF

KENNETH E. WEST
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Chapter 13 Trustee

Via ECF

By: /s/ Angela C. Pattison

Angela C. Pattison, Esq.,

Attorney ID 307611

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